

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY****REGION 8****999 18TH STREET- SUITE 300****DENVER, CO 80202-2466****Phone 800-227-8917****<http://www.epa.gov/region08>**

May 5, 2005

Ref: 8EPR-SR

Mr. John Podolinsky
Montana Department of Environmental Quality
Permitting and Compliance Division
Asbestos Control Program
1520 East Sixth Ave
P.O. Box 200901
Helena, MT 59620-0901

RE: Libby Asbestos Site Building Demolition Procedures

Dear John:

As you are aware, EPA is required to meet, to the extent practicable, applicable and appropriate and relevant requirements by the National Contingency Plan (NCP), 40 C.F.R. § 300.415(j). The purpose of this letter is to indicate EPA's compliance with that requirement as it relates to notification under the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements [40 CFR 61.145 (b)] to the Montana Department of Environmental Quality (MDEQ). As you know, EPA is conducting cleanup of asbestos-contaminated residential and commercial properties in the Libby area of Lincoln County, MT. This work is currently being undertaken using removal authority, consistent with Section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). As part of the removal actions we intend to conduct this year, we expect to dismantle the following structures:

- 105 West 2nd Street
- 30 Parmenter Drive

EPA has determined these structures contain unacceptable levels of Libby amphibole asbestos contamination and require immediate cleanup. In each case, EPA has determined that the structures are unsound or cannot be effectively remediated through traditional abatement approaches.

In keeping with the purpose and intent of the Asbestos NESHAP regulations (40 CFR 61.145 "Standard for Demolition and Renovation" and 40 CFR 61.150 "Standard for Waste Disposal for Manufacturing, Fabricating, Demolition, Renovation, and Spraying Operations") to protect the public health by minimizing the release of asbestos when facilities that may contain

asbestos-containing materials are demolished or renovated, the following additional work practices will be followed before, during, and after the demolition:

- Prior to demolition, EPA's contractors will thoroughly wet all readily accessible asbestos-containing materials (ACM), including but not necessarily limited to vermiculite or vermiculite insulation. These readily accessible materials are defined as those materials that can be safely accessed as determined by EPA designated field representatives at the project site. Some materials may be removed prior to demolition as appropriate.
- During demolition activities, copious amounts of water will be applied with fire hoses and nozzles capable of wetting all debris generated throughout demolition activities. Appropriate controls will be implemented to ensure that all over-spray will be contained and controlled during demolition activities.
- During and after demolition, water will be used to keep the materials wet during all handling and transport operations. All material generated as a result of demolition will be treated as ACM and disposed of at the Lincoln County Asbestos Landfill. All vehicles used during the transport of these materials will be tarped and sealed.
- EPA will conduct perimeter air and settled dust sampling, which will be performed in accordance with the methods and procedures contained a Sampling and Analysis Plan developed specifically for demolition/demolition activities conducted by EPA in 2005. This sampling will ensure that the purpose and intent of the Asbestos NESHAP has been met during demolition and that no unacceptable concentrations of asbestos are migrating from the work area.
- Soil removal or cleanup of remaining hard surfaces will occur after demolition as necessary. Clearance sampling, per current EPA Libby Asbestos Site protocols, will be conducted to ensure all unacceptable contamination is removed.
- Photographic documentation will be collected during the demolition and loading activities to provide evidence of zero visible emissions [40 CFR 61.150 (a)].
- Community outreach activities will be conducted, including notice in the local newspapers of the impending work and notification of nearby residents or businesses.

Currently, these are the only structures that we are aware of that require demolition. However, please be advised that we intend to do these types of notifications similarly in the future as appropriate. If you have any questions, please contact me at (303) 312-6748.

Sincerely,



Jim Christiansen
Remedial Project Manager